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### REMARKS

Claims 1, 47 and 82-97 were pending. Applicant has added new claims 98-110. Claims 1, 47 and 82-110 are believed to be allowable, as discussed below.

#### Claim Rejections - 35 U.S.C. § 103

Claims 1, 88, 94, 95 and 97 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Landsman* (U.S. Pat. No. 4,764,815) in view of *Eberhard* (U.S. Pat. No. 5,437,360). Applicant respectfully disagrees.

Independent claim 1 recites, among others, "drive means for engaging the printing plate in direct contact with the stationary support bed and sliding the printing plate on the support bed". This feature is taught by neither *Landsman* nor *Eberhard*. Citing *Landsman* at col. 5, line 35, Examiner maintained that *Landsman* disclosed the "direct contact" feature. A closer review of *Landsman*, however, reveals that the reference actually supports Applicant's position. The passage in *Landsman* pointed out by Examiner states that it is the primary platen 30 and lower platen 32 that are "slidably" supported on guide rails 26, 28...". *Landsman* at col. 5, line 34-36. However, the platens 30, 32 are not printing plates or any other photo sensitive media to be exposed by the energy from the optical head. They are only parts of a support platform carrying the printing plate. As the passage immediately following the above-quoted passage states, "The medium to be scanned ... is secured to the top surface of the flatbed primary platen 30. This medium is thus incrementally advanced with the platen 30 underneath the scanning shuttle." *Id.* at col. 5, lines 37-43. Indeed, the elimination of the platens 30, 32 is one aspect of the invention that facilitates increased speed with which the medium can be scanned.

Neither does *Eberhard* teach the "direct contact" limitation. In *Eberhard*, the belt 2 that moves the load 1 raises the load 1 above the support rollers 3 when advancing the load 1. *Landsman* and *Eberhard*, even if legitimately combined, therefore would not teach all elements of claim 1. Claim 1 is therefore not obvious in light of the references cited. *See*, MPEP § 2143.03. Claim 88, being dependent on claim 1, includes further features and advantages over the prior art and is therefore also not obvious.

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Similarly, independent claim 94 and claims 95 and 97, which are dependent on claim 94, are not obvious over the cited references. Claim 94 recites a support bed with a stationary support surface to "directly support the printing plate with one face of the printing plate in sliding contact with the support surface" and a drive means for "sliding the printing plate over the stationary support surface." Neither *Landsman* nor *Eberhard*, individually or in combination, teaches directly supporting the printing plate on the stationary support surface in a sliding contact. Claims 94, 95 and 97 are therefore not obvious in light of the cited references.

Claims 47, 87, 89 and 91-93 were rejected under 35 U.S.C. § 103(a) as unpatentable over *Landsman* in view of *Eberhard* and *Bergling* (U.S. Pat. No. 4,015,702). Applicant respectfully disagrees. Independent apparatus claim 47 requires "a carriage for engaging the printing plate in direct contact with the stationary support bed and sliding the printing plate on the supporting bed". Similarly, independent method claim 87 requires "disposing a printing plate on, and in direct contact with, the stationary support area." As discussed above, neither *Landsman* nor *Eberhard* teaches engaging the printing plate in direct contact with the stationary support bed. *Bergling* comes no closer. In *Bergling*, although there is a conveyor with roller wheels on it, the patent does not show the work piece being held in direct contact with the wheels. *Bergling* is silent on the position of the work piece relative to the wheels. However, *Bergling* speaks of centering the guide laterally to minimize the range of torque on the guide about the longitudinal axis of the guide. If the work piece were in direct contact with the wheels themselves, the torque would not be an issue. *Bergling* therefore does not teach maintaining the work piece on the support bed. Claims 47 and 87, as well as claims 89 and 91-93, each of which depends on either claim 47 or 87, are not obvious in light of the cited references.

#### Allowable Subject Matter

Claims 82-84, 90 and 96 were deemed to contain allowable subject matter but were objected to because they depended on rejected claims. The finding of allowable subject matter is greatly appreciated. Because Applicant believes that the base claims that the claims

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objected to depend on are allowable, Applicant does not believe amendment of these claims are necessary.

Applicant notes with appreciation the allowance of claims 85 and 86.

#### New Claims


Claims 98-110 have been added. They each contain at least one element not taught or suggested in the prior art and therefore should be allowable. For example, claim 98 requires a carriage adapted to "maintain the printing plate at the level of the support plane and in direct contact with the support bed". In addition to the elements of claim 98, dependent claim 99 requires that the carriage is moveable across the support field in stepwise motion; claim 100 requires the support to be adapted to maintain the printing plate at a precise distance from the optical head while the carriage moves the printing plate across the support field"; claim 101 requires that "the support bed is adapted to maintain the printing plate flat in the support plane"; and claim 102 requires that "the carriage is adapted to securely maintain the printing plate in a stationary position while the optical head moves and emits energy onto the printing plate." Claims 103-110 have similar limitations, respectively.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully Submitted,

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